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**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON**

In re:  
  
GIGA WATT, Inc., a Washington  
corporation,  
  
Debtor.

Case No. 18-03197 FPC 7  
  
The Honorable Frederick P. Corbit  
  
Chapter 7

**CHAPTER 7 TRUSTEE'S  
MOTION FOR ORDER  
ALLOWING, BUT NOT  
AUTHORIZING PAYMENT OF,  
CHAPTER 11 ADMINISTRATIVE  
EXPENSE (STRETTO)**

Mark D. Waldron, in his capacity as the duly-appointed Chapter 7 Trustee, by and through his attorneys, moves the Court to allow, but not authorize payment of, the chapter 11 administrative claim of Bankruptcy Management Solutions, Inc. d/b/a Stretto ("Stretto") in the amount of \$3,513.27. A proposed Order is attached hereto as **Exhibit A**.

This Motion is brought pursuant to 11 U.S.C. §§ 363, 503(b)(1), and 726(b). Before this case converted to one under Chapter 7 on September 30, 2020 pursuant to the *Order Converting Case*, [ECF No. 744](#), Stretto served as the estate's claims and noticing agent pursuant to the *Order Appointing Bankruptcy*

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Allow But Not Pay Chapter 11  
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1 *Management Solutions, Inc. d/b/a/ Stretto as Claims and Noticing Agent and*  
2 *Administrative Advisor, filed on June 3, 2019, [ECF No. 324](#). In the last month*  
3 *before conversion, that is, in September 2020, Stretto performed its claims and*  
4 *noticing services. However, in accordance with ordinary business practice, Stretto*  
5 *did not bill the estate for the services provided in September 2020 until October*  
6 *2020. The Chapter 7 Trustee did not have the authority to pay Stretto for its pre-*  
7 *conversion services and did not pay Stretto's invoice. Stretto is not performing*  
8 *services in the Chapter 7 case. A copy of the invoice from Stretto is attached*  
9 *hereto as **Exhibit B**.*

10 In the Trustee's judgment, this expense was reasonable and necessary.

11 Wherefore, the Plaintiff respectfully requests that the Court allow the claim  
12 of Stretto in the amount of \$3,513.27 as an administrative claim incurred pre-  
13 conversion, without authority to pay the claim pending further Order of this Court;  
14 and grant such other and further relief as the Court considers just and appropriate.

15 Dated: February 15, 2021 POTOMAC LAW GROUP PLLC

16 By: /s/ Pamela M. Egan  
17 Pamela M. Egan (WSBA No. 54736)  
18 *Attorneys for Mark D. Waldron, Chapter 7*  
*Trustee*

19 I, Mark D. Waldron, declare based on my personal knowledge, that the  
20 foregoing is true and correct.

21 Dated this 17<sup>th</sup> day February 2021 in Tacoma, Washington.

22   
23 Mark D. Waldron, Ch. 7 Trustee

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